

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CONSUELLA GRIFFIN, as)
administratrix and personal)
representative of the estate of)
Andrew Moreland, Jr., deceased,)
)
Plaintiff,)
)
v.)
)
MODULAR TRANSPORTATION)
COMPANY, et al.,)
)
Defendants.)

**CIVIL ACTION NUMBER:
2:12-cv-02378-WMA**

DECLARATION OF MICHAEL G. GREEN II
PURSUANT TO 28 U.S.C. § 1746

My name is Michael G. Green II. I am a resident of the State of Alabama, over twenty-one (21) years of age, and give this Declaration of my own free will. I have personal knowledge of the information contained in this Declaration.

1. I am the court-appointed guardian *ad litem* for Minor Defendant Aaliyah Moreland and I have knowledge of the facts of the matter referenced herein.

2. The Bill of Costs attached hereto is true and correct and represents fees and costs which have necessarily been incurred in this

case and the services for which fees have been charged were actually and necessarily performed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of June, 2014.



Michael G. Green II

441182

UNITED STATES DISTRICT COURT

for the

Northern District of Alabama

Consuella Griffin, as administratrix & personal
rep. of Estate of Andrew Moreland, Jr. deceased

v.

Modular Transportation Company, et al.

Case No.: 2:12-cv-02378-WMA

BILL OF COSTS

Judgment having been entered in the above entitled action on _____ against _____ ,
Date
 the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ _____
Fees for service of summons and subpoena	_____
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	_____
Fees and disbursements for printing	_____
Fees for witnesses (<i>itemize on page two</i>)	0.00
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.	_____
Docket fees under 28 U.S.C. 1923	_____
Costs as shown on Mandate of Court of Appeals	_____
Compensation of court-appointed experts	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	_____
Other costs (<i>please itemize</i>)	3,174.00
TOTAL	\$ 3,174.00

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

☐

Electronic service

☐

First class mail, postage prepaid

☐

Other: _____

s/ Attorney: _____

Name of Attorney: _____

For: _____

Name of Claiming Party

Date: _____

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By: _____

*Clerk of Court**Deputy Clerk**Date*

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

NOTICE

"Sec. 1924. Verification of bill of costs."

See also Section 1920 of Title 28, which reads in part as follows:

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

The Federal Rules of Civil Procedure contain the following provisions:

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

RULE 6

(d) **Additional Time After Certain Kinds of Service.**

When a party may or must act within a specified time after service and service is made under Rule5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

RULE 58(e)

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

Lehr Middlebrooks & Vreeland, P.C.**Listing for Time**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Comp Task Activity	Units	Price	Value
05/27/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Review Motion for Appointment of Guardian Ad Litem; correspondence with Carr Allision regarding potential appointment, insurers, and potential conflict.	T	0.60	230.00	138.00
05/27/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with J. Acker regarding guardian ad litem appointment.	T	0.10	230.00	23.00
05/27/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with M. Petway and D. Thomas regarding settlement structure.	T	0.50	230.00	115.00
05/27/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Follow up correspondence with D. Thomas regarding contact information and pertinent settlement documents.	T	0.20	230.00	46.00
05/27/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Review and analysis of pertinent pleadings previously filed with the Court, including defendants' motion for partial summary judgment and the depositions of K. Jones and R. Phinizee.	T	1.50	230.00	345.00
05/28/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Thomas regarding status of settlement.	T	0.10	230.00	23.00
05/28/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with C. Griffin regarding speaking with A. Moreland and settlement.	T	0.40	230.00	92.00

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Search for: 1684-014 Search by: Matter ID Stage: (all)
Type: (all)

Lehr Middlebrooks & Vreeland, P.C.**Listing for Time**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Comp Task Activity	Units	Price	Value
05/28/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Review settlement documents produced by C. Griffin.	T	0.10	230.00	23.00
05/28/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with A. Moreland regarding settlement.	T	1.00	230.00	230.00
05/28/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Thomas regarding handling settlement tomorrow.	T	0.30	230.00	69.00
05/29/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Review and analysis of proposed settlement and order, including associated research; correspondence with D. Thomas regarding the same.	T	0.50	230.00	115.00
05/29/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Meeting with D. Thomas, C. Griffin, and A. Moreland at F. Buck's offices concerning outstanding issues prior to settlement hearing.	T	1.50	230.00	345.00
05/29/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Attend settlement hearing before J. Acker.	T	1.00	230.00	230.00
05/29/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Thomas regarding amendments to settlement.	T	0.10	230.00	23.00

Lehr Middlebrooks & Vreeland, P.C.**Listing for Time**

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Comp Task Activity	Units	Price	Value
05/29/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with K. Driskill regarding handling settlement and fees.	T	0.20	230.00	46.00
05/29/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Babb, Forge Consulting, regarding confirmation of annuity handling.	T	0.30	230.00	69.00
05/30/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Babb regarding handling annuity and points of contact.	T	0.30	230.00	69.00
06/02/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Review and analysis of court's proposed memorandum opinion.	T	0.20	230.00	46.00
06/02/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Drafting pro ami petition, motion to seal, and bill of costs.	T	2.00	230.00	460.00
06/02/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Edit/revise pro ami petition, motion to seal, and bill of costs.	T	1.00	230.00	230.00
06/02/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Review/edit/revise bill of costs and associated affidavit.	T	0.30	230.00	69.00

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Date	Prof	Matter ID/Client Sort Matter Description Narrative	Comp Task Activity	Units	Price	Value
06/02/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Drafting closing letter to A. Moreland, regarding resolution of case, enclosing appropriate documents and court filings.	T	0.50	230.00	115.00
06/02/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Thomas regarding setting probate estate in Jefferson County probate court; edit/revise pro ami petition, motion to seal, and bill of costs accordingly.	T	0.50	230.00	115.00
06/03/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Thomas regarding edits to consent motion to seal, and bill of costs.	T	0.10	230.00	23.00
06/03/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Edit/revise pro ami petition, motion to seal, and bill of costs.	T	0.20	230.00	46.00
06/03/2014	MGG	1684-014/ Guardian Ad Litem Cases Consuella Griffin, as mother and next friend of Aaliyah Moreland, a Correspondence with D. Thomas and K. Driskill regarding consent to pro ami petition, motion to seal, and bill of costs.	T	0.30	230.00	69.00
Grand Total:				13.80		\$3,174.00